

SMITH&KING LLC

www.SmithandKinglaw.com

LONG ISLAND OFFICE:
666 OLD COUNTRY ROAD
SUITE 305
GARDEN CITY, N.Y. 11530
Telephone: (516) 213-0018
Fax: (917) 591-3244

David S. Smith, Esq.[†]
Brian King, Esq.[†]
[†]Admitted in New York and California
[†]Admitted in New York and Connecticut

NEW YORK CITY OFFICE:^{*}
900 THIRD AVENUE, 13th FLOOR
NEW YORK, N.Y. 10022
Telephone: (212) 681-2800
Fax: (917) 591-3244

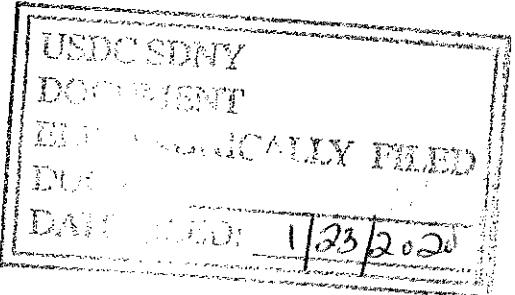
^{*}Please send all mail to the Garden City Office

MEMO ENDORSED

January 17, 2020

Hon. Denise L. Cote
U.S. District Court
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: U.S. v. Michael Campana
Dkt No. 1:19-cr-00859-DLC-1



Your Honor:

As the Court is aware, our law firm represents Defendant Michael Campana in the above-referenced matter. On November 26, 2019, Mr. Campana pled guilty to a one-count Information, charging him with Tax Evasion, pursuant to 26 U.S.C. §7201, and his sentencing is scheduled for March 20, 2020.

Mr. Campana lives in Tuckahoe, New York and his current bail conditions restrict his travel to SDNY, EDNY, NDNY, and New Jersey. We respectfully request that the Court expand those restrictions to allow him to travel to and from the District of Connecticut. Mr. Campana's father is the owner of a small masonry company, called Campana Masonry, that currently has a project ongoing in Greenwich, CT. His father is undergoing knee surgery today, however, and will not be able to work for several months. He has asked Michael to assist with the project in Greenwich while he is recovering from surgery. Michael would like to provide this assistance, which would require him to travel back and forth to Connecticut.

We have communicated with the AUSA David Lewis and Pretrial Officer Vincent Adams regarding this request and they both consent to it. Accordingly, we respectfully ask the Court to modify Mr. Campana's bail conditions to permit travel to and from Connecticut.

Thank you for your consideration.

*Denise L. Cote
1/23/20*

Respectfully submitted,

*David Smith
David Smith*

cc: AUSA David Lewis